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RESPONSE OF PLABELL RUBBERS PRODUCTS CORPORATION  
TO EPA INFORMATION REQUESTS ON  
STICKNEY AND TYLER STREET SITES - TOLEDO, OHIO

RECEIVED  
SEP 21 1993

GENERAL RESPONSE TO ALL INFORMATION REQUESTS

SUPERFUND PROGRAM  
MANAGEMENT BRANCH

Except to the extent indicated in the specific responses to the EPA Information Requests indicated below, Plabell Rubber Products Corporation and its officers and other representatives have no personal knowledge, and little or no indirect knowledge, of the waste storage, treatment or disposal and handling practices used by previous owners or occupants of 300 South St. Clair Street prior to 1982. Plabell Rubber Products Corporation (the "Company") is a new corporation formed in the fall of 1992 to acquire the rubber plant at 300 South St. Clair Street, Toledo, Ohio. The Company conducted no business operations until April 13, 1993, on which date it purchased the real estate, equipment and machinery, inventory and work-in-progress of Plabell Rubber Products, Inc., a debtor-in-possession in a Chapter 11 bankruptcy proceeding. (Among other assets, the Company purchased the right to use the "Plabell Rubber Products" name.) The Company was not operating any business on the premises prior to that date, and accordingly had no responsibility for or control over the waste disposal practices of prior occupants of the property. In addition, the Company has access to limited records of the prior occupants of the 300 South St. Clair Street premises relating to the periods between 1951 and 1981, and does not employ or otherwise have access to any individuals employed by the prior owners who were responsible for the storage and disposal of wastes during these periods. All information provided in these responses is, therefore, based on the Company's information and belief, except to the extent otherwise specifically stated herein.

SPECIFIC RESPONSES

1. Identify all persons consulted in the preparation of these responses to the EPA Information Requests.
  - A. Lawrence K. Friedeman, President, Plabell Rubber Products Corporation, 300 South St. Clair Street, Toledo, Ohio 43697.  
Telephone: (419) 241-7184  
Home Address: 472 Patriot Drive, Waterville, Ohio 43566  
Telephone: (419) 878-8459
  - B. Delbert Base, a salaried employee of the Company who was employed by the prior owner during the late 1970s, was consulted as to the persons employed by the prior owner

before 1982 and their responsibilities. Mr. Base's business address and telephone number are the same as that of the Company.

- C. Barb Calcamuggio, a salaried employee of the Company, was consulted as to contents of the records of the prior owner of the plant in the possession of the Company. Ms. Calcamuggio's business address and telephone number are the same as those of the Company.
2. Identify all documents consulted, examined or referred to in the preparation of these responses to the EPA Information Request.

In preparing these responses, the Company has reviewed records left on the premises by the prior owner, Plabell Rubber Products, Inc., debtor-in-possession, and examined the portions of these limited records containing information relating to the disposal of waste by prior owners of the 300 South St. Clair Street facility. This data consists of:

Purchase Journals, invoices from portions of the relevant period and the prior owner's check register from 1980 and 1981 which evidences that the prior owner on occasions made payments to the waste haulers identified in the response to Information Request 7 below.

3. If you have reason to believe that there may be persons able to provide a more detailed complete response to any of the EPA Information Request or who may be able to provide additional responsive documents, identify such persons.

The Company believes that there are numerous other persons who would be able to provide more detailed responses to the EPA Information Requests. Based on the Company's belief, these persons may include:

- A. Plabell Rubber Products, Inc., or other previous owners of the property. The Company is not aware of the correct current business mailing addresses for Plabell Rubber Products, Inc. or that of any other prior owner.
- B. The three waste transportation companies which are identified in prior owner's records as being been paid to transport waste from the 300 South St. Clair Street plant -- Community Sanitation, Waste Management, Inc. and Browning-Ferris, Inc.
- C. Various individuals previously employed by the prior owners of the plan during the period from 1951 to 1981.

4. List the EPA Identification Numbers of the Company.

The Company did not have any EPA Identification Numbers assigned to it prior to its acquisition of the 300 South St. Clair Street in April, 1993. Accordingly, the EPA Identification Number used by the Company is OHD005034806, which is the same Identification Number used for the 300 South St. Clair Street plant by the prior owner of the property.

5. Identify the acts or omissions of any persons, other than the Company's employees, contractors, or agents, that may have caused the release, or threat of release, of hazardous substances, pollutants, or contaminants or damages resulting therefrom.

The Company and its officers and other representatives have no knowledge and no beliefs beyond conjecture as to the acts or omissions of other persons that may have caused any releases or threats of releases of hazardous substances, pollutants or contaminants on the Stickney Avenue Landfill site and the Tyler Street dump site. The Company has no access to information not available to the general public about the operation of these sites, and, in particular, has not itself participated in the operation of the sites and/or the transportation of any materials to these sites.

6. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of material at the Sites.

With the limited exception of the waste transporter/haulers identified with the response to Information Request 7, the Company and its employees have no information or belief about what persons would have knowledge or information with respect to the generation, transportation, treatment, disposal or other handling of material at the Stickney Avenue Landfill site and Tyler Street dump site.

7. Identify all persons, including the Company, who may have arranged for disposal or treatment, or arranged for transportation for disposal or treatment of waste materials, including hazardous substances, at the Stickney Avenue and Tyler Street Sites.

Based upon a review of the limited records provided to the Company by Plabell Rubber Products, Inc., the prior owner of the plant, the prior owner appears to have made payments to Community Sanitation on several occasions between 1969 and 1971, and to Waste Management, Inc. and Browning-Ferris, Inc. during 1980 and 1981. The previous owners apparently utilized the services of one or all of the these firms to remove waste materials generated at the plant. Nothing in these records indicates who arranged for the disposal or treatment of the wastes, the intended destination or final disposition of the waste materials transported.

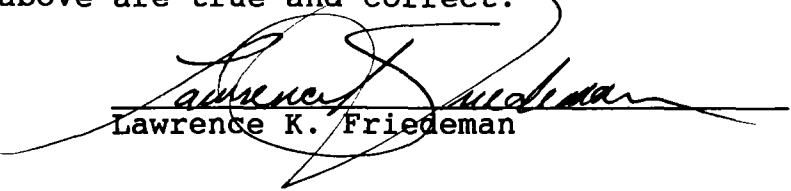
This information is based on copies of invoice and pick-up receipts in records in the Company's possession. The Company does not have any records which would enable it to provide more detailed information than that provided above.

8. If your waste was not taken to the Stickney Avenue Landfill site or the Tyler Street dumpsite during the period from 1951 to 1981, where were your wastes taken and how were they disposed?

The Company did not conduct any business operations or generate any waste prior to its acquisition of the 300 South St. Clair Street plant in April, 1993. Accordingly, no waste generated by the Company were taken to the Stickney Avenue Landfill or the Tyler Avenue dumpsite during the period from 1951 to 1981.

Based upon a review of the written records in the Company's possession relating to the disposal of waste by the prior owner(s) of 300 South St. Clair Street plant during the periods prior to 1982, and without any personal knowledge thereof, it is the Company's belief that the prior owner on several occasions utilized Browning-Ferris, Inc., Waste Management, Inc. and/or Community Sanitation to remove waste generated at the South St. Clair Street plant. Other waste haulers may also have been utilized by the prior owner, but the Company cannot identify or document any relationship between the prior owner of the plant and other haulers or waste disposal service providers.

The undersigned hereby certifies that he is the President of Plabell Rubber Products Corporation, that he has completed a search of the records in the possession of the Company containing information relating to the disposal of waste by the prior owners of the Company's plant, that he has interviewed present employees of the Company who may have knowledge of the operations, waste use, storage, treatment, release, spills, disposal or other handling practices of the prior owners of the Company's plant between 1951 and 1981, and that to the best of his knowledge, the information and statements provided above are true and correct.

  
Lawrence K. Friedeman

STATE OF OHIO)

) SS:

COUNTY OF LUCAS)

The foregoing instrument was acknowledged before me this \_\_\_ day of September, 1993, by Lawrence K. Friedeman, the President of Plabell Rubber Products Corporation, an Ohio corporation, on behalf of the corporation.

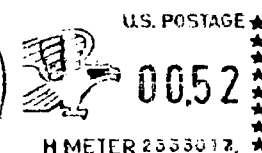
  
Notary Public

My Commission Expires: May 29 1996

[SEAL]

**SHUMAKER, LOOP & KENDRICK**

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**FIRST CLASS MAIL**

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